

**CHRISTENSEN JAMES & MARTIN**

KEVIN B. CHRISTENSEN, ESQ.

Nevada Bar No. 00175

EVAN L. JAMES, ESQ.

Nevada Bar No. 007760

LAURA J. WOLFF, ESQ.

Nevada Bar No. 006869

7440 W. Sahara Ave.

Las Vegas, NV 89117

(702) 255-1718

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Painters Joint Committee, through its designated  
fiduciaries, John Smirk and Thomas Pfundstein;  
IUPAT Industry Pension Fund; Employee Painters'  
Trust; Painters Vacation-Holiday Savings Fund;  
Painters Joint Apprenticeship and Journeyman  
Training Trust; Painters Industry Promotion Fund;  
Painters JCIP Fund; Painters Organizing Fund; and  
Painters Labor Management Contract Fund,

Plaintiffs,

vs.

J.L. Wallco, Inc. dba Wallalternatives, a Nevada  
corporation; Genuine Quality Coatings, Inc., a  
Nevada Corporation; Sunrise Painting/RCH, Inc., a  
Nevada Corporation; Richard Rejan Nieto,  
individually and dba Genuine Quality Coatings,  
Inc.; Claudia Bammer aka Claudia Nieto, an  
individual; Richard Raoul Nieto, an individual;  
Shrader and Martinez Construction Inc., a Nevada  
corporation; Merchants Bonding Company; Great  
American Capital aka Great American Capitol, a  
Nevada Corporation.

Defendants.

Case No. 10-cv-1385-JCM-PAL

**STIPULATION AND ORDER  
PROTECTING CONFIDENTIAL  
SETTLEMENT INFORMATION**

The undersigned parties, hereby stipulate as follows:

1. Shrader and Martinez Construction, Inc.; Richard Raoul Nieto; and Claudia Bammer (collectively "Defendants") have requested information from the Plaintiffs showing how much money from specific parties has been received in this litigation by the Plaintiffs through settlement;
2. The Plaintiffs are willing to provide the information but desire a protective order from the Court to ensure that there are no violations of any confidentiality provisions that may exist in settlement documents and that there are no violations of any confidentiality expectations that the settling parties may have had;

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7440 W. SAHARA AVE., LAS VEGAS, NEVADA 89117  
PH: (702) 255-1718 & FAX: (702) 255-0871

- 1 3. The Defendants therefore agree that they will hold in strict confidence and not share,  
2 disseminate, or make available any settlement information between the Plaintiffs and any  
3 other party that may be disclosed to them now or in the future;
- 4 4. Unless disclosure is ordered by a court, the Defendants further agree that they will hold  
5 the Plaintiffs completely harmless (including but not limited to actual damages, incidental  
6 damages, legal fees and costs) from any intentional or negligent disclosure of the  
7 confidential information that results from their conduct or lack thereof.

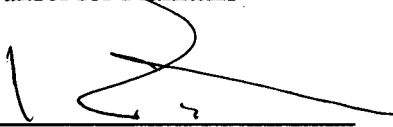
8 Dated this 4th <sup>April</sup> day of ~~March~~, 2014.

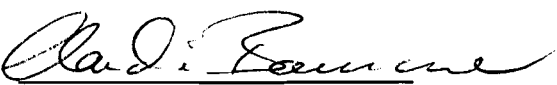
9 CHRISTENSEN, JAMES & MARTIN

PICHARD PARRY KOLBE

10 By: Evan L. James  
11 Evan L. James, Esq.  
12 Nevada Bar No. 7760  
13 7440 W Sahara Ave.  
14 Las Vegas, NV 89117  
15 Counsel for Plaintiffs

By: Zachariah B. Parry  
Zachariah B. Parry, Esq.  
Nevada Bar No. 11677  
10120 South Eastern Avenue, Suite 140  
Henderson, NV 89052  
Counsel for SMC

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Richard Nieto  
6943 Cedar Basin Ave.  
Las Vegas, NV 89142  
In Proper Person

  
Claudia Bammer  
6943 Cedar Basin Ave.  
Las Vegas, NV 89142  
In Proper Person

18 ORDER

19 IT IS SO ORDERED.

20 United States District Court Magistrate Judge

21   
22 Peggy A. Leen

23 Submitted by:

Dated: April 9, 2014

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25 By: Evan L. James  
26 Evan L. James, Esq.  
27 Nevada Bar No. 7760  
28 7440 W Sahara Ave.  
Las Vegas, NV 89117  
Counsel for Plaintiffs